

FINAL – 9/21/2015

**Acting RA Talking Points
for Calls with Federal, State and Local Elected Officials the week of September 21, 2015**

Reports Released by the Missouri Attorney General:

I know you're interested in our view of the Missouri Attorney General's Office's reports that were prepared in support of the State's lawsuit against Republic Services.

We have shared these documents and held follow up consultations with EPA's Office of Research and Development (ORD) and Office of Solid Waste and Emergency Response (OSWER), as well as with the U.S. Geological Survey (USGS) and the U.S. Army Corps of Engineers (USACE).

Based upon our initial review and consultations, we have not seen anything in the reports to change our overall assessment of conditions at the site.

My office has one goal at the site and that is to protect the health of the people who work at and live around the West Lake Landfill. To accomplish this goal, it is this Agency's duty to complete the investigations necessary to support a remedy decision, to select a final remedy, and to implement that remedy as quickly as possible.

Area 1 and 2 Additional Characterization:

As I indicated to you last week, we are moving forward with the additional RIM characterization work planned for Areas 1 and 2 at the site.

Late last week, EPA gave the Potentially Responsible Parties' (PRPs) approval to proceed with the work in accordance with the approved work plans.

This is critical work needed to support a remedy decision.

The EPA has determined that the approved work plans and site Health and Safety plans provide sufficient protocols to ensure protection of site workers and the public during field activities in Areas 1 and 2.

These plans contain specific protective measures related to clearing of site vegetation, dust suppression and monitoring of personnel and equipment for radioactive contamination, as well as decontamination if needed prior to exiting the work areas.

As a reminder, both the Missouri Department of Natural Resources and Republic Services have on-site air monitors designed and operated to detect releases of radioactivity, among other things.

In addition, in order to ensure that the protective measures are implemented appropriately, all field activities will be overseen by a certified Health Physicist and by trained EPA personnel.

The major tasks associated with the additional investigation:

- 25 boring locations will be surveyed and staked in the field, and on-site personnel familiar with

the locations will of any underground utilities, or infrastructure will inspect the locations to verify the absence of utilities or infrastructure.

- Gravel paths will be constructed to each boring location and drilling pads at each location will be constructed in the same manner as those that were constructed in Phase I work. The extent of the anticipated vegetation clearing is very small, approximately a quarter acre in Area 1 and approximately one acre in Area 2.
- Vegetation removal and construction of access roads and drill pads will be performed using the same procedures previously employed for those activities during the prior Phase 1 and Phase 1D investigations in Area 1.
- A drill rig will be brought on site to drill soil borings and collect soil core samples at each location.

SSE Update

EPA's Office of Research and Development reviews data and reports available on the MDNR website related to the SSE. ORD provides quarterly reports and a comprehensive annual report to EPA Region 7 to assist in monitoring the status and advancement of the SSE. To date, none of the ORD reports indicate rapid advancement of the SSE toward areas containing known RIM. EPA Region 7 will continue to enlist the expertise of ORD in monitoring the SSE.

Pyrolysis Update

EPA is evaluating testing methodologies which may be available to support decisions related to an isolation barrier and to selection of a final remedy. EPA is working closely with a contract lab to examine analytical methods which could be employed to increase our understanding of potential impacts of an SSE contacting RIM.

Off-Site Data Summary

As you may remember there have been a number of significant assessments over the years in the community around the landfill:

- The EPA's ASPECT overflight of the Site and nearby residential and commercial/industrial properties in 2013 detected no off-Site excess gamma emissions in surface soil anywhere off-Site, and only on-Site in one small area of OU-1 Area 2 as previously identified in the Remedial Investigation.
- Off-Site groundwater sampling by the USGS and the EPA of privately-owned wells to the northwest and southwest of the site in 2013 revealed no radionuclide exceedances of drinking water standards, and to our knowledge there is no use of private wells in the area for drinking water.
- The MDNR conducted soil sampling in 2005 along St. Charles Rock Road, Boenker Road and Taussig Road just outside Site boundaries and did not detect uranium, thorium, or radium above the cleanup standards.
- In addition, the EPA's 2014 Bridgeton Municipal Athletic Complex sampling found no exceedances for uranium, thorium, or radium.
- Lastly, the Missouri Department of Health and Senior Services analyzes ambient air monitoring data for the Bridgeton Landfill collected by the MDNR, and to date the state reports

summarizing this analysis do not indicate that there is a potentially unacceptable risk to human health. The data from volatile organic compounds (VOCs), hydrogen sulfide (H₂S), carbon monoxide (CO), benzene and gamma radiation monitoring are published daily by the MDNR. Moreover, EPA has completed an offsite air monitoring effort with similar results.

We are continuing to work closely with the MDNR to monitor site conditions. It is the EPA's priority to ensure that the right steps are taken to adequately monitor and address any release or threat of release of hazardous substances, pollutants, or contaminants from the Site. We will continue to closely evaluate the information provided by the Missouri Attorney General's Office.

Q and A

1. What about the AG reports indicating offsite migration? Is EPA going to conduct offsite sampling?

Answer: EPA is relying on the body of validated scientific data which does not support the conclusion that RIM has migrated offsite. Our efforts remain focused on completing the onsite investigations necessary to support a final remedy decision.

2. What is the status of the isolation barrier?

Answer: Pending receipt of the validated data from the Phase 1D investigation and subsequent consultation with USACE, EPA expects to make a decision regarding an isolation barrier. We expect that decision to be made this calendar year.

3. What is EPA doing to protect residents from the SSE that is approaching the RIM?

Answer: EPA does not believe there is imminent danger of the SSE reaching RIM. EPA supports MDNR efforts and direction to Republic Services regarding the monitoring and development of corrective measures. EPA is focused on getting a final remedy in place which will provide long term protection of the public.

4. Please provide more details about your review of the AG's reports.

Answer: EPA has completed our initial evaluation of a collection of documents from the Missouri Attorney General's Office which were prepared in support of the State's lawsuit against Republic Services. The documents total more than 1,700 pages which provides analyses of conditions on and around the West Lake Landfill Superfund Site.

EPA Region 7 has shared these documents and held follow up consultations with EPA's Office of Research and Development (ORD) and Office of Solid Waste and Emergency Response (OSWER), as well as with the U.S. Geological Survey (USGS) and the U.S. Army Corps of Engineers (USACE).

Our experts have reviewed the testing methodologies and results described in the reports, along

with the previously collected environmental air, water and soils sampling data we have available to us. Based upon that body of information, we do not believe that there is scientifically valid evidence that people living near and working outside the boundaries of the West Lake Landfill Superfund Site are currently being exposed to contaminants released from the Site that are above levels of concern.